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U.S. District Court
Eastern District of MO

UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF MISSOURI

DIVISION

Kierra Shanta Martin
on Behalf of
~~Robert L. Swearingen~~ K.B.

Complaint for a Civil Case

Case No.

(to be assigned by Clerk of
District Court)

Plaintiff requests trial by jury:

☐ Yes ☒ No

(Write the full name of each plaintiff
who is filing this complaint. If the
names of all the plaintiffs cannot fit in
the space above, please write "see
attached" in the space and attach an
additional page with the full list of
names.)

v. Robert L. Swearingen
of

Legal Services of Eastern
Missouri

(Write the full name of each defendant.
The caption must include the names of
all of the parties. Fed. R. Civ. P. 10(a).
Merely listing one party and writing "et
al." is insufficient. Attach additional
sheets if necessary.)

CIVIL COMPLAINT

NOTICE:

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date, the full name of a person known to be a minor, or a complete financial account number. A filing may include only: the last four digits of a social security number, the year of an individual's birth, a minor's initials, and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the \$400.00 filing fee or an application to proceed without prepaying fees or costs.

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Kierra Shanta Martin
Street Address	General deVeir IV
City and County	St. Louis
State and Zip Code	Missouri 63166
Telephone Number	314-477-4783
E-mail Address	KiERRA Martin 716@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Robert L. Swearingen
Job or Title	Attorney - Consumer Law Program
Street Address	4232 Forest Park Ave
City and County	St. Louis
State and Zip Code	Missouri 63108
Telephone Number	314-256-8726
E-mail Address	rlswearingen@lsem.org

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant. If you are suing for violation of your civil rights, you must state whether you are suing each defendant in an official capacity, individual capacity, or both.)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only three types of cases can be heard in federal court. Provide the information for this case. (Include all information that applies to your case)

A. Federal question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Negligence.
legal Malpractice, Emotional distress
intentional ~~intentional~~
infliction Emotional distress.

B. Suit against the Federal Government, a federal official, or federal agency

List the federal officials or federal agencies involved, if any.

Legal Services of Eastern
Missouri

C. Diversity of Citizenship

These are cases in which a citizen of one State sues a citizen of another State or nation, and the amount at stake is more than \$75,000. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

1. The Plaintiff(s)

The plaintiff, (name) Kierra Shanta Martin, is a citizen of the
State of (name) Missouri.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

If the defendant is an individual

The defendant, (name) Robert L. Swearingen, is a citizen
of the State of (name) Missouri Or is a citizen
of (foreign nation) _____.

If the defendant is a corporation

The defendant, (name) Robert L. Swearingen

is incorporated under the laws of the State of (name)

Legal Services of Eastern Missouri and has its principal place of
business in the State of (name) _____ Or

is incorporated under the laws of the State of (foreign nation)

_____, and has its principal place

of business in (name) Legal Services of Eastern Missouri

(If more than one defendant is named in the complaint, attach an
additional page providing the same information for each additional
defendant.)

3. The Amount in Controversy

The amount in controversy----the amount the plaintiff(s) claims the defendant(s)
owes or the amount at stake----is more than \$75,000, not counting interest and
costs of court, because (explain):

III. Statement of Claim

Type, or neatly print, a short and plain statement of the FACTS that support your claim(s). For every defendant you have named in this complaint, you must state what he or she personally did to harm you. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Do not make legal arguments, or cite court cases or statutes. You may attach additional pages if necessary.

Your statement of claim must include all of the following information:

1. What happened to you? *got defrauded and illegal evicted*
2. When did it happen? *2017*
3. Where did it happen? *St Louis MO, 8800 maga lane*
4. What injuries did you suffer? *Great emotional distress pain and suffering*
5. What did each defendant personally do, or fail to do, to harm you?
legally represent me. fill the correct information with the courts. To fix the judgement that was put on my name due to writ of error.

IV. Relief

State briefly and precisely what damages or other relief you want from the Court. Do not make legal arguments.

Do you claim the wrongs alleged in your complaint are continuing to occur now?

Yes ☒ No ☐

Do you claim actual damages for the acts alleged in your complaint?

Yes ☒ No ☐

Do you claim punitive monetary damages?

Yes ☒ No ☐

If you indicated that you claim actual damages or punitive monetary damages, state the amounts claimed and the reasons you claim you are entitled to recover these damages.

*10,000 negligent infliction of emotional distress
caused for me and my child.*

*5,000 legal malpractice, breach of fiduciary duty,
breach of contract.*

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 30 day of Oct, 20 19.

Signature of Plaintiff(s)

*Kierin S. Martin on behalf
K.B.*